

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADVANCEME, INC.,
Plaintiff,
v.

RAPIDPAY LLC, FIRST FUNDS LLC,
MERCHANT MONEY TREE, INC.,
REACH FINANCIAL, LLC, and
FAST TRANSACT, INC. d/b/a
SIMPLE CASH,

Defendants.

ADVANCEME, INC.,
Plaintiff,
v.

AMERIMERCHANT, LLC.,
Defendant.

§ CIVIL CASE NO. 6:05-cv-424 (LED-JDL)

§ CIVIL CASE NO. 6:06-cv-0082 (LED-JDL)

§ **JURY TRIAL DEMANDED**

**PLAINTIFF ADVANCEME, INC.'S UNOPPOSED MOTION FOR LEAVE TO FILE
ITS SEALED MOTION FOR SANCTIONS IN EXCESS OF PAGE LIMIT**

Plaintiff, AdvanceMe, Inc., respectfully requests leave of Court to allow plaintiff AdvanceMe, Inc. ("AdvanceMe") to file a Sealed Motion for Sanctions in excess of the fifteen (15) page limit allowed by Local Rule CV-7. AdvanceMe requests that this Court allow it to exceed the fifteen page limit by 10 pages, excluding attachments. Plaintiff requests the additional pages because it has determined that the current length of the brief is necessary to best present its argument to the Court.

Counsel for AdvanceMe, Inc. has conferred with Joseph Gray and Willem Schuurman, counsel for Defendants, and Matt Rowan, local counsel for Defendants. Defendants have stated that they do not oppose this motion.

A proposed Order is attached for the Court's convenience.

Dated: May 16, 2007

Respectfully submitted,

By: /s/ Robert C. Matz

PAUL, HASTINGS, JANOFSKY & WALKER LLP
Ronald S. Lemieux
(CA Bar No. 120822) (Admitted *Pro Hac Vice*)
Michael N. Edelman
(CA Bar No. 180948) (Admitted *Pro Hac Vice*)
Vidya R. Bhakar
(CA Bar No. 220210) (Admitted *Pro Hac Vice*)
Robert C. Matz
(CA Bar No. 217822) (Admitted *Pro Hac Vice*)
Shanée Y. Williams
(CA Bar No. 221319) (Admitted *Pro Hac Vice*)

Five Palo Alto Square, Sixth Floor
Palo Alto, CA 94306-2155
Telephone: (650) 320-1800
Telecopier: (650) 320-1900
Email: ronlemieux@paulhastings.com

IRELAND, CARROLL & KELLEY, P.C.
Otis W. Carroll, Attorney-in-Charge
State Bar No. 03895700
Deborah Race
State Bar No. 16448700
6101 South Broadway, Suite 500
Tyler, TX 75703
Telephone: 903-561-1600
Facsimile: 903-581-1071
Email: fedserv@icklaw.com

ATTORNEYS FOR PLAINTIFF ADVANCEME, INC.

CERTIFICATE OF CONFERENCE

The undersigned counsel for AdvanceMe, Inc. has conferred with Willem Schuurman, Joseph Gray, counsel for Defendants, and Matt Rowan, local counsel for Defendants. Defendants have stated that they do not oppose this motion.

/s/ Robert C. Matz

Robert C. Matz

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served a copy of this document via the court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on this the 16th day of May, 2007. Any other counsel of record will be served by first-class mail on this same date.

/s/ Robert C. Matz

Robert C. Matz